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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Todd Hoch,
11 Plaintiff,
12 vs.
13 Gaughan South LLC, d/b/a South Point Hotel
14 and Casino, The Las Vegas Metropolitan
Police Department, A. Pavlov (Doe
Defendant 1), John Monje (Doe Defendant
VIII), Angel Lopez (Doe Defendant IX),
15 Vincent Miozza (Doe Defendant X), Jordan
Etzig (Doe Defendant XIII) and any
remaining unnamed Defendant Does I-XV,
16
17 Defendants.

Case Number:
2:23-cv-00066-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND LVMPD DEFENDANTS'
RESPONSE TO PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT ESTABLISHING
LIABILITY FOR VARIOUS TORTS AS
INDICATED IN THE MEMORANDUM
BELOW**

(SECOND REQUEST)

19 Plaintiff Todd Hoch ("Plaintiff"), by and through his counsel of record, Robert A.
20 Nersesian, Esq. and Thea Marie Sankiewicz, Esq., of Nersesian & Sankiewicz, Defendants,
21 the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD") and
22 Officer A. Pavlov ("Pavlov"), collectively ("LVMPD Defendants"), by and through their
23 counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis
24 Aurbach, and Defendant Gaughan South LLC, d/b/a South Point Hotel and Casino
25 ("Gaughan South"), by and through their counsel of record, Jose Carmona, Esq. and James
26 P.C. Silvestri, Esq., of Pyatt Silvestri, hereby agree and jointly stipulate the following.

27 Accordingly, the parties hereby stipulate and agree as follows:

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1 1. Plaintiff filed a Motion for Partial Summary Judgment Establishing Liability
2 for Various Torts as Indicated in the Memorandum Below on March 21, 2024 [ECF No. 49].

3 2. LVMPD Defendants' counsel had several conflicts that prohibited the
4 completion of LVMPD Defendants' Response to Plaintiff's Motion for Partial Summary
5 Judgment, including depositions in the case of *B.H., et al. v. CCSD, et al.*, United States
6 District Court, District of Nevada, Case No. 2:23-cv-00564-JCM-DJA, drafting an
7 approximately 50 page response to a dispositive motion in the case of *Phillip Semper, et al.*
8 v. *LVMPD, et al.*, United States District Court, District of Nevada, Case No. 2:20-cv-01875-
9 JCM-EJY and an Emergency Room trip to the hospital regarding an allergy attack.

10 3. The Parties further agree, LVMPD Defendants' Response to Plaintiff's
11 Motion for Partial Summary Judgment Establishing Liability for Various Torts [ECF No.
12 49] deadline currently set for April 25, 2024 shall be extended to Monday, April 29, 2024.

13 4. WHEREFORE, the parties respectfully request that LVMPD Defendants'
14 Response to Plaintiff's Motion for Partial Summary Judgment Establishing Liability for
15 Various Torts [ECF No. 49] be extended to and including Monday, April 29, 2024.

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5. The instant stipulation is being made in good faith and not for purposes of delay and that no party waives any arguments by entering into this stipulation.

IT IS SO STIPULATED.

Dated this 25th day of April, 2024.

Dated this 25th day of April, 2024.

NERSESIAN & SANKIEWICZ

MARQUIS AURBACH

By: /s/ Robert A. Nersesian

By: /s/ Jackie V. Nichols

Robert H. Nersessian, Esq.
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Officer A. Paylov

Dated this 25th day of April, 2024.

PYATT SILVESTRI

By: /s/ Jose Carmona

Jose Carmona, Esq.
Nevada Bar No. 14494
James P.C. Silvestri, Esq.
Nevada Bar No. 3603
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Las Vegas, Nevada 89101
Attorneys for Gaughan South LLC, d/b/a
South Point Hotel and Casino

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND LVMPD DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ESTABLISHING LIABILITY FOR VARIOUS TORTS AS INDICATED IN THE MEMORANDUM BELOW (SECOND REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 25th day of April, 2024.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach